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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 18 1992

MEMORANDUMOFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Response to a 604 Phase 4 Response Submission and a Review of Data Requirements for Pirimiphos-Methyl.

FROM: Douglas Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C) 6/15/92

TO: John McSweeney, PM Team Reviewer
Accelerated Reregistration Branch
Special Review and Reregistration Division (H7508W)

The Ecological Effects Branch has completed a preliminary review of the following avian reproduction studies for Pirimiphos-methyl conducted with chickens:

Graham, C. A., and Jenkins, S.L., 1978. The Effects of Pirimiphos-Methyl ('Actellic') on the Growth Rate of Broiler Chicks. Merrindaler Research Station, Dorset Road, Croydon Victoria 3136. MRID No. 80723.

Green, T., Monks, Irene H, and Philips P.J. Pirimiphos-Methyl (PP 511): Sub Acute Oral and Residue Studies in Hens. MRID No. 80722.

Ross, David B., Christopher, David H., Cameron, David M., Egg Production and Hatchability Following Inclusion of Pirimiphos-Methyl at Various Levels in the diet of the Laying Hen. MRID No. 80725.

Ross, David B., Burroumghs, Sheila J., and Roberts, Nicholas L., 1974, Amended 1978, Egg Production and Hatchability in the Laying Hen Following dietary Inclusion of Pirimiphos-Methyl at Various Levels. MRID No. 80724.

These studies do not fulfill data requirements for Pirimiphos-methyl for the following reasons:

- The test species used (chickens) are not an acceptable test species. These studies should be conducted with bobwhite quail and mallard duck.



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- The number of test replicates were too low.
- Individualized data were not provided.
- The duration of the tests was not long enough.
- Justification for the dosage levels chosen for the tests was not provided.

The Ecological Effects Branch identified data gaps in the memo dated October 12, 1990 (see attached).

Since the proposed use is for the treatment of wild bird seed, the EEB has determined that the greatest potential exposure to avian species may be to songbirds. Therefore, the following studies are now required:

70-1 Special Test, Avian Acute Oral with the House Sparrow ¹

71-4 Avian Reproduction studies with both bobwhite quail and mallard duck ²

For further technical questions please contact Dan Balluff at 305-6108.

¹ This study should follow the existing protocol for 71-1(a) Avian Acute Oral study where possible.

² The dosage levels for these studies must be adequately justified.